

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

JACQUELINE D. BLY,

Debtor

Case No. BK-15-14357-SAH
Chapter 7

**AMENDED DEBTORS RESPONSE TO CREDITOR, U.S. BANK NATIONAL
ASSOCIATION'S MOTION FOR RELIEF FROM AUTOMATIC STAY AND
ABANDONMENT OF PROPERTY AND BRIEF IN SUPPORT THEREOF AND
NOTICE OF OPPORTUNITY FOR HEARING AND RESPONSE BRIEF IN SUPPORT**

COMES NOW, Debtor, Jacqueline D. Bly, by and through her attorney of record, Raymond A. Vincent, of Pool & Vincent, and hereby responds to Creditor, U.S. Bank National Association's Motion for Relief from Automatic Stay and Abandonment of Property and Brief in Support Thereof and Notice of Opportunity for Hearing. Debtor responds as follows:

Any allegation not specifically admitted to herein is denied.

1. Admit
2. Admit
3. Denied
4. Denied. Debtor has entered into a payment arrangement with Creditor.
5. Denied
6. Denied

RESPONSE BRIEF IN SUPPORT

Creditor's Motion alleges that Debtor has fallen in arrears on her mortgage, and that no such mortgage payment has been made by Debtor since on or about October 1, 2015. Creditor reports that payments are due and owing from Debtor for the months of November, 2015, December 2015, January 2016, and February 2016. It is Debtor's understanding, however, that she has entered into a payment arrangement with Creditor, and Debtor made a payment for same in the amount of

\$856.56 on the 1st of March, 2016. (See attached email from payment center for Creditor dated March 1, 2016.) Additionally, on or about the 18th day of February, 2016; five (5) days preceding Creditor filing its motion, Debtor made an escrow payment in the amount of \$264.43. (See attached copy of Money Order Receipt dated February 18, 2016.)

WHEREFORE, above premises considered, Debtor respectfully requests that this Court deny Creditors motion, and to any such further relief that this Court deems equitable and just.

Respectfully submitted,

/s/Raymond A. Vincent

Raymond A. Vincent, OBA # 7716

Pool & Vincent

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NOTICE OF HEARING ON CREDITOR, U.S. BANK NATIONAL'S MOTION FOR RELIEF FROM AUTOMATIC STAY AND ABANDONMENT OF PROPERTY AND BRIEF IN SUPPORT THEREOF AND NOTICE OF OPPORTUNITY FOR HEARING

You are notified that a hearing on Creditor, U.S. Bank National's Motion for Relief from Automatic Stay and Abandonment of Property and Brief in Support thereof and Notice of Opportunity for Hearing has been set for the 23rd day of March, 2016 at 9:30 o'clock a.m. in the courtroom of the Honorable Judge Sarah Hall at 215 Dean A. McGee Ave, 9th Floor, Oklahoma City, OK 73102.

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of March, 2016, Debtor's Response was electronically filed with the Court using the ECF System for Filing. Based on the records currently on file, the Clerk will transmit a notice of electronic filing to the following:

Robert A. Brown Trustee

I further certify that on the 14th day of March, 2016, I served the attached document by first class mail, postage pre-paid thereon to the following parties to wit:

Jacqueline D. Bly
1148 MW 85th Street
Oklahoma City, OK 73114

and

Matrix

/s/Raymond A. Vincent
Raymond A. Vincent

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